

# EXHIBIT “B”

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

CAROLYN RICKARD,  
ADMINISTRATRIX OF THE ESTATE  
OF WILLIAM J. RICKARD, Deceased,

CIVIL DIVISION

Plaintiff,

No.: GD-14-020549

v.

Code:

THE WALSH GROUP LTD.,  
an Illinois Business Corporation;  
WALSH CONSTRUCTION COMPANY,  
an Illinois Business Corporation, t/d/b/a  
Walsh Northeast; WALSH CONSTRUCTION  
COMPANY II, LLC, an Illinois Business  
Corporation; WALSH CONSTRUCTION  
GROUP, LLC, an Illinois Business Corporation;  
SARGENT ELECTRIC COMPANY, a  
Pennsylvania Business Corporation; CONCRETE  
RESTORATION SPECIALISTS, LLC,  
an Ohio Business Corporation; INDEPENDENCE  
EXCAVATING, INC., an Ohio Business  
Corporation; W.G. TOMKO, INC., a Pennsylvania  
Business Corporation, PARKING LOT  
PAINTING CO., LLC, a Pennsylvania Business  
Corporation; MICHAEL BAKER JR., INC.,  
a Pennsylvania Business Corporation;  
BETH'S BARRICADES, a Pennsylvania Business  
Corporation; COMMONWEALTH OF  
PENNSYLVANIA, PENNSYLVANIA  
DEPARTMENT OF TRANSPORTATION;  
GENERAL MOTORS, LLC, a Delaware  
Business Corporation f/k/a General Motors  
Company; GENERAL MOTORS CORPORATION,  
a Delaware Business Corporation; MOTORS  
LIQUIDATION COMPANY, a Delaware  
Business Corporation f/k/a General Motors  
Corporation; GENERAL MOTORS COMPANY,  
a Delaware Business Corporation; GENERAL  
MOTORS HOLDINGS, LLC, a Delaware Business  
Corporation; WOODLEY PAUL, an individual and  
CHARLES PHILLIPS, an individual.

Defendants.

**STIPULATION**

Filed By:  
Plaintiffs

Counsel of Record for  
This party:

Arthur Cutruzzula, Esquire  
Pa. I.D. #27915

Walter J. Nalducci, Esquire  
Pa. I.D. #69256

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CUTRUZZULA & NALDUCCI  
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(412) 391-4040

**A JURY TRIAL DEMANDED**

DEPT. OF JUDICIAL AFFAIRS  
CIVIL/FAMILY DIVISION  
ALLEGHENY COUNTY PA

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FILED

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Plaintiff,

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an Illinois Business Corporation;  
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Corporation; WALSH CONSTRUCTION  
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Company; GENERAL MOTORS CORPORATION  
a Delaware Business Corporation; MOTORS  
LIQUIDATION COMPANY, a Delaware  
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Corporation; GENERAL MOTORS COMPANY,  
a Delaware Business Corporation; GENERAL  
MOTORS HOLDINGS, LLC, a Delaware Business  
Corporation; WOODLEY PAUL, an individual and  
CHARLES PHILLIPS, an individual,

Defendants.

CIVIL DIVISION

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### STIPULATION

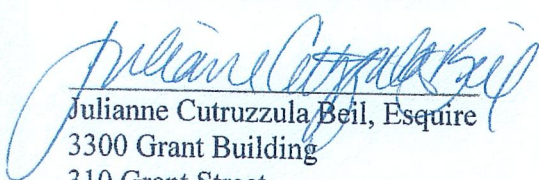
The Plaintiffs and Defendant General Motors, LLC, through their respective counsel undersigned, hereby agree and stipulate to the following:

1. General Motors, LLC f/k/a General Motors Company ("GM LLC") agrees, without admitting any liability, that it is the proper party to be named in this matter and, pursuant to the Master Sales and Purchase Agreement governing the sale of certain assets from General Motors Corporation to GM LLC, it assumed responsibility in place of General Motors Corporation for certain claimed injuries and damages alleged to have been caused by motor vehicles sold by General Motors Corporation, including the subject 2002 Chevy S-10 vehicle, which arise directly out of accidents that occurred after July 9, 2009.

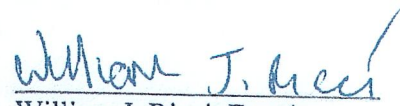
2. GM LLC agrees and stipulates that it will not identify, claim or otherwise assert the fault or strict liability of the following entities:

- a. Motors Liquidation Company f/k/a General Motors Corporation;
- b. General Motors Holding, LLC;
- c. General Motors Company; and
- d. General Motors Corporation.

CUTRUZZULA & NALDUCCI

  
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Administratrix of the Estate of  
William J. Rickard, Deceased

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General Motors, LLC f/k/a General Motors  
Company